FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

JDM/JF: USAO#2015R000199

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CLERK'S OFFICE
AT BALTIMORE

BY ____ DEPUTY

BRH
9/19/16

UNITED STATES OF AMERICA	
v.	**CRIMINAL NO.** ELH-16-0466
LEROY FUENTES, JR.,	**(Conspiracy To Distribute And Possess With Intent To Distribute Cocaine, 21 U.S.C. § 846; Forfeiture)**
FERNANDO LOPEZ,	
LUIS LOPEZ,	
ANGEL PADILLA,	
EILEEN PEREZ,	
ROY FUENTES, JR., aka "Tito,"	
TROY DANIEL BAKER,	
Defendants.	

INDICTMENT

COUNT 1
(Conspiracy To Distribute And Possess With Intent To Distribute Cocaine)

The Grand Jury for the District of Maryland charges that:

From in or about October 2014 until in or about September 2016, in the District of Maryland and elsewhere, the defendants

LEROY FUENTES, JR.
FERNANDO LOPEZ
LUIS LOPEZ
ANGEL PADILLA
EILEEN PEREZ
ROY FUENTES, JR., aka "Tito,"
TROY DANIEL BAKER

did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to knowingly and intentionally distribute and possess with the intent to distribute five hundred grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 U.S.C. §§ 841, 846.

FORFEITURE ALLEGATIONS

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant(s) that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 981(a)(1)(C), 21 U.S.C. § 853, and 28 U.S.C. § 2461 in the event of the defendant(s)'s convictions under Count 1 of this Indictment.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendants,

LEROY FUENTES, JR.
FERNANDO LOPEZ
LUIS LOPEZ
ANGEL PADILLA
EILEEN PEREZ
ROY FUENTES, JR., aka "Tito,"
TROY DANIEL BAKER

shall forfeit to the United States of America:

a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and

b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s).

3. If any of the property described above, as a result of any act or omission of the defendant(s):

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)
21 U.S.C. § 853
28 U.S.C. § 2461(c)
Fed. R. Crim. P. 32.2(a)

Rod Rosenstein by [illegible]
ROD J. ROSENSTEIN
UNITED STATES ATTORNEY

A TRUE BILL:

SIGNATURE REDACTED

9-20-16
Date

Foreperson